

July 15, 2021

MEMO ENDORSED

Document Electronically Filed

Hon. Barbara C. Moses
United States Magistrate Judge
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: <u>7/16/21</u>

Re: Donohue v. Commissioner of Social Security
Civil Action No: 1:20-cv-07647-BCM

Dear Judge Moses:

This letter respectfully requests an extension of time of sixty-six (62) days for Plaintiff to serve her Motion for Judgment on the Pleadings in this matter. Plaintiff's Motion for Judgment on the Pleadings is currently due on July 20, 2021. However, due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met. Plaintiff cannot meet the current briefing deadline. This extension is needed to thoroughly and properly prepare her Motion.

Plaintiff's counsel has contacted defense counsel who consents to this request. This would be a first request to extend the time to serve Plaintiff's Motion.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on **September 20, 2021**. Subsequently, in accordance with the pattern of the Standing Order, the Commissioner's response to the Motion for Judgment on the Pleadings would then be due **November 19, 2021**. Plaintiff's Reply would then be due **December 10, 2021**.

Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky

Howard D. Olinsky, Esq.


Bar Code H06529

Counsel for Plaintiff

CC [via ECF]: Joseph Anthony Pantoja (Counsel for Defendant)

Application GRANTED. In light of the lengthy extension requested, no further extensions of plaintiff's motion deadline will be granted. SO ORDERED.

July 16, 2021
New York, NY


Honorable Barbara C. Moses
U.S. Magistrate Judge